

1:16 MJ 4006

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Luczak, having been duly sworn, depose and state the following:

**I. Introduction**

1. I have been employed as a Special Agent with the United States Secret Service ("USSS") since 2004. During that time, I have received formal training in the investigation of threats directed towards persons protected by the USSS. I have received training from the Federal Law Enforcement Training Center in Glynco, Georgia, and the USSS Special Agent Training Course in Beltsville, Maryland. In addition, I was a Uniformed Division Officer with the USSS from June 2002 through December 2004.

2. I make this affidavit in support of a criminal complaint against and arrest warrant for JONATHAN SMEAD (hereinafter "SMEAD"), for violating Title 18, United States Code, Section 871 (Threats against the President and successors to the Presidency) and Section 875 (Threat Against Another Via Interstate Communication). As described more fully below, there is probable cause to believe that SMEAD did knowingly and willfully make a direct threat to take the life of or inflict bodily harm to the President of the United States. Additionally, SMEAD transmitted in interstate commerce a communication to injure the person of another as well as a current candidate for the office of President of the United States.

3. The information contained in this affidavit is based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials and witnesses. It does not include each and every fact known by the government, but only those necessary to support a finding of probable cause.

## **II. Probable Cause**

4. On Sunday, February 28, 2016, at approximately 10:16 PM CST, the USSS, Chicago Field Office received a phone call from phone number 214-534-6911, which was forwarded from the USSS, Cleveland Field Office, due to the after-hours nature of the call. This phone conversation was recorded.

5. The caller immediately inquired if the line was recorded. Before the duty agent had a chance to respond, the caller stated "I want to kill President Obama." The caller inquired if his statement was a federal offense. The caller continued to speak about past assassins to include John Wilkes Booth and Lee Harvey Oswald. The caller then stated he "wants to kill Hillary Clinton." The caller identified himself as Jonathan Smead (hereinafter "SMEAD"), date of birth of 12/24/1980, and provided his Social Security number and that he is living with his grandmother at 1616 Spring Rd, Cleveland, OH. Finally, SMEAD stated he "wants federal charges, not little state charges."

6. On February 29, 2016, SMEAD was interviewed at the USSS, Cleveland Field Office, by Sgt. John Traine, Cleveland Police Department (CPD) and this Affiant.

7. SMEAD admitted to making the above referenced phone call on February 28, 2016. SMEAD stated he had been drinking alcohol prior to making the call and does not know why he decided to threaten the President and Presidential Candidate Hillary Clinton. SMEAD then stated that he does not wish to harm either President Obama or Hillary Clinton. SMEAD stated he has recently been watching the television show The West Wing, a fictional television show about the President of the United States, and he is

very interested in past Presidents, including specifically John F. Kennedy and Abraham Lincoln, who were both assassinated.

8. SMEAD stated he has an interest in assassins and past presidential assassinations, particularly the Kennedy assassination. SMEAD also stated he has visited the Texas School Book Depository, the site of the Kennedy assassination, years ago as a tourist.

9. On February 29, 2016, USSS Special Agents met with Joyce Smead at her address of 1616 Spring Rd., Apt B, Cleveland, OH. Ms. Smead is identified as Jonathan SMEAD's step-grandmother. Ms. Smead confirmed SMEAD has been residing with her since December 2015.

10. Ms. Smead confirmed that the phone number (214-534-6911) used by SMEAD to call the USSS was her personal cell phone. Ms. Smead also gave consent to the agents to conduct a search of her apartment.

11. During their discussion with Ms. Smead, she stated that SMEAD was raised by his step-father in Dallas, TX. She also stated that SMEAD'S step-father was the main source of upbringing and income for SMEAD, who was currently not working.

12. Ms. Smead stated that SMEAD has been mentally distraught since the death of his step-father in April of 2015.

13. Ms. Smead also stated to the agents that SMEAD has an obsession of anything to do with the Kennedy assassination. This includes reading books, watching television shows, and having verbal discussions regarding the Kennedy assassination in Dallas, TX.

14. During the consensual search, agents located two books in the room where SMEAD sleeps. The first book was The Kennedy Curse written by Edward Klein and the other was From Love Field written by Nellie Connally. The subject matter of both books is the assassination of President Kennedy.

15. On March 1, 2016, an agent spoke with Lisa Henry, SMEAD'S sister, over the telephone. Upon learning of what her brother did, Ms. Henry stated that her brother is an alcoholic and needs help.

16. Ms. Henry further stated that SMEAD was living with her after his step-father died but SMEAD moved out in December of 2015 because she could not take care of him anymore. She confirmed that SMEAD has had a hard time dealing with the death of his step-father.

17. Ms. Henry also confirmed that SMEAD has an obsession with the Kennedy assassination, and that she cannot be around him when he drinks.

18. Ms. Henry further states that SMEAD has spoken about killing himself before he moved to Cleveland in 2015. She stated that SMEAD entered the Navy sometime after 1999, but was discharged after he threatened to commit suicide.

19. Finally, Ms. Henry stated that she believed that SMEAD called the police and threatened to kill the President of the United States two years ago. She believed the incident occurred when SMEAD had been drinking, but did not believe the police ever charged him with a crime for that incident.

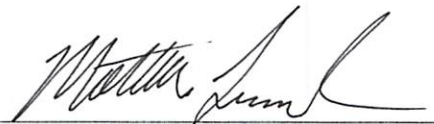
20. Additionally, on February 22, 2016, SMEAD called the Mobile Crisis Intervention Line threatening suicide with a gun to his head and a knife to his throat. When CPD Officers arrived at SMEAD's home, he exited the home and approached

officers with what appeared to be a handgun in his waistband. The handgun turned out to be a replica weapon unable to fire live ammunition. SMEAD was disarmed without incident, although when questioned by responding officers, SMEAD stated he was still upset over the passing of his father and wanted to harm himself.

21. Cell phones such as the type Ms. Smead owns and SMEAD used to convey his threats to kill President Obama and Hillary Clinton communicate through transmissions that travel through interstate commerce.

### III. Conclusion

22. Based on the above information, I respectfully submit there is probable cause to believe that JONATHAN SMEAD did knowingly and willfully make a direct threat to take the life of or inflict bodily harm to the President of the United States in violation of Title 18, United States Code, Section 871 (Threats against the President and successors to the Presidency).



Matthew Luczak  
Special Agent  
U.S. Secret Service  
Cleveland Field Office

Subscribed and sworn  
before me this 2nd day of  
March, 2016.



United States Magistrate Judge